Exhibit 3

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION)
OPIATE LITIGATION)
) MDL No. 2804
This document relates to:)
) Case No. 17-md-2804
City of Cleveland v. Purdue Pharma L.P., et al.,)
Case No. 18-OP-45132 (N.D. Ohio)) Hon. Dan Aaron Polster
)
The County of Cuyahoga v. Purdue Pharma)
L.P., et al., Case No. 17-OP-45004 (N.D. Ohio))
)
The County of Summit, Ohio, et al. v. Purdue)
Pharma L.P. et al., Case No. 180OP-45090)
(N.D. Ohio))
)
)
)

ALLERGAN'S FOURTH AMENDED OBJECTIONS AND RESPONSES TO PLAINTIFFS' CORRECTED SECOND SET OF INTERROGATORIES

Pursuant to Federal Rules of Civil Procedure 26 and 33 as well as the Case Management Order (Dkt. No. 232) in *In re: National Prescription Opiate Litigation*, Defendant Allergan hereby responds and objects to Plaintiff's First Interrogatories (the "Requests"). Allergan incorporates all objections and statements set forth in its August 31, 2018 Objections and Responses to Plaintiffs' Second Set of Interrogatories, its October 22, 2018 First Amended Objections and Responses to Plaintiffs' Second Set of Interrogatories, its November 16, 2018 Second Amended Objections and Responses to Plaintiffs' Second Set of Interrogatories, and its January 22, 2019 Third Amended Objections and Responses to Plaintiffs' Second Set of Interrogatories to the extent not overruled by the court or separately agreed-to.

In addition to the fact that Plaintiffs and their witnesses have not identified any specific wrongdoing by Allergan entities or their former affiliates or any specific harm caused by any conduct of these entities, Allergan refers Plaintiffs to the following facts as examples of those on which it may rely in future proceedings in this matter with respect to Kadian®:

- The FDA originally approved Kadian®'s New Drug Applications in 1996.
- Allergan did not acquire Kadian® until December 2008.
- Allergan has not detailed or otherwise promoted Kadian® since at least January 1, 2014.
- The limited promotion performed on Allergan's behalf between 2009 and 2013 was entirely appropriate.
- The limited promotion of Kadian® performed during that short 2009-2013 timeframe was handled by individuals employed by InVentiv, and not Allergan. Allergan personnel instructed InVentiv to promote Kadian® consistent with Kadian®'s FDA-approved label, which contained comprehensive warnings and information regarding Kadian®'s risks.
- Allergan did not engage in the promotional activities that Plaintiff alleges other Defendants engaged in, such as use of "Key Opinion Leaders," "front groups" or "speakers' bureaus" (as those terms are used in Plaintiff's Complaint) for the promotion of Kadian® or for the promotion of opioids as a class.
- Kadian®'s market share has declined substantially since Allergan acquired Kadian®. For example, in 2011, Kadian®'s market share was less than one quarter of one percent. In 2016, for instance, Kadian®'s market share was less than one twentieth of one percent.

Allergan refers Plaintiffs to the following facts as examples of those on which it may rely in future proceedings in this matter with respect to Norco®:

- No Plaintiff has made a single allegation of wrongdoing with respect to Norco® at any point.
- The FDA originally approved Norco®'s Abbreviated New Drug Applications ("ANDAs") in 1997.
- Based on Allergan's investigation to date, Allergan has not promoted Norco® for approximately a decade and a half, since at least 2003.
- Norco®'s market share has declined substantially since approval of its ANDAs in 1997. In 2009, only 119,094 Norco® prescriptions were written nationally, and only 1,200 of those prescriptions were written in Ohio. Norco® prescriptions have declined even further since then. For instance, in 2016, only 58,653 Norco® prescriptions were written nationally, and only 977 of those prescriptions were written in Ohio. In 2016, Norco® prescriptions constituted just 0.03% of the total market of opioids prescribed in the United States.

In providing this information, Allergan does not intend to limit in any way the evidence, information, arguments, testimony or defenses it may introduce at trial or any other proceeding. To the extent that this interrogatory seeks additional information, Allergan objects that it is

were identified by looking at prescriber data and identifying current prescribers of Kadian®, branded morphine, and generic morphine. If these prescribers were within the territories of Inventiv sales representatives, the sales representatives would be assigned these prescribers. If these prescribers were not within the territories of Inventiv sales representatives, Actavis Inc. would send these names to TMS Health and Technekes so that a telesales representative could call the prescriber. When a prescriber on a TMS Health or Technekes call list was being detailed inperson by Inventiv, that prescriber would be removed from TMS Health's and Technekes's call list and added to a "Do Not Call" list. Based on Allergan's investigation to date, Allergan has not identified any other reasons prescribers were removed from the call list. Allergan has not located any other information responsive to this request for its current Allergan entities, or for the Actavis Generics Companies which are no longer affiliated with Allergan and which generally did not detail generic drugs.

INTERROGATORY NO. 25: Identify and provide salary and bonus information for all of Your former or current Employees who were or are engaged in Marketing to Prescribers or ensuring compliance with applicable laws, policies, and procedures in the Jurisdictions, including all Employees who (1) developed, implemented, reported on, or supervised Marketing Activities that included or targeted Prescribers in the Jurisdictions; (2) gave, assisted, or supervised speaking programs, CME, or other promotional events, programs, or meetings conducted in the Jurisdictions or attended by Prescribers from the Jurisdiction; (3) were responsible for ensuring compliance with state and federal laws and regulations regarding the Marketing of Opioids, any settlement, corporate integrity, consent judgment, or plea agreement and/or the compliance with laws and regulations related to preventing diversion of controlled substances. Include in your response the titles and dates of employment for all such individuals.

AUGUST 31, 2018 RESPONSE TO INTERROGATORY NO. 25: Allergan objects to this Request by adopting and incorporating by reference its General Objections and Objections to Definitions. Also, Allergan further objects because Plaintiffs have exceeded the 35-interrogatory limit when counting subparts. In addition, discovery is ongoing and Allergan's investigation is ongoing, and thus it specifically reserves the right to supplement its response. Further, Allergan objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of this case to the extent it purports to call for "salary and bonus information" for "all" employees involved in any such activity. Allergan interprets this Request as calling for compensation information for sales representatives.

Subject to and without waiving its objections, and subject to further investigation, discovery and proceedings in this matter, Allergan states that Ventiv Commercial Services, LLC ("Ventiv") was retained between May 1, 2009 to December 31, 2012 to promote Kadian®. Technekes, LLC ("Technekes") also was retained in mid-2012 through 2013 to conduct marketing services relating to Kadian®, including telemarketing and mailing promotional materials to prescribers. The contracts with these third-party contractors included information regarding the sales representatives' and telemarketers' compensation. Allergan refers Plaintiffs to its document production for further information. For example, Allergan refers Plaintiffs to the following documents compensation: for additional information regarding that ALLERGAN_MDL_00986816; ALLERGAN_MDL_00076479.

OCTOBER 22, 2018 RESPONSE TO INTERROGATORY NO. 25: Allergan

incorporates all objections and statements set forth in its August 31, 2018 Objections and Responses to Plaintiffs' Second Set of Interrogatories. In accordance with the Court's September 21, 2018 Order, Allergan supplements this Interrogatory response with regards to generic opioids.

Subject to and without waiving its objections, Allergan states that it has never itself manufactured, marketed or sold generic drugs. Prior to the fall of 2016, Allergan f/k/a Actavis, Inc. directly or indirectly owned the equity of Actavis Elizabeth LLC, Actavis Pharma, Inc. (f/k/a Watson Pharma, Inc.), Actavis Laboratories FL, Inc. (f/k/a Watson Laboratories Inc. Florida), and Watson Laboratories, Inc. (the "Actavis Generics Companies"). Each of the Actavis Generics Companies is now owned by Teva. Based on Allergan's investigation to date, the individuals with primary responsibility for Actavis generic drugs either remained with the Actavis Generics Companies or left the companies altogether prior to or at the time of the transaction. Allergan, therefore, has not been able to locate any current or former business person at Allergan who had primary responsibility for generics opioids and who has information responsive to Interrogatory No. 25. Nonetheless, Allergan is searching documents that are in Allergan's possession that belong to the Actavis Generics Companies pursuant to the Court's September 21, 2018 Order. Pursuant to Federal Rule of Civil Procedure 33, Allergan refers Plaintiffs to its production of documents pursuant to that Order.

NOVEMBER 16, 2018 RESPONSE TO INTERROGATORY NO. 25:

Subject to and without waiving its objections, and based on Allergan's investigation to date, the below table identifies the primary persons in the sales and marketing departments for Kadian®, Norco®, and generic opioids sold by former affiliates no longer owned by Allergan and compensation information, if any, that has been identified to date:

Employee	Role	Compensation Information	
Dirk Pica	Regional Sales Manager	In addition to a salary, Dirk Pica was	
	(Norco®)	entitled to a bonus in which 75% of his	
		compensation was based on objective	
		market share and market share change for	
		his portfolio of products, and the	
		remaining 25% was based on his	
		manager's assessment of his performance.	
Bill Chase	Regional Sales Manager	No compensation information located	
	(Norco®)		
Jim Wallace	Regional Sales Manager	No compensation information located	
	(Norco®)		
Mike Pusateri	Executive Director, Sales	No compensation information located	
	(Norco®)		
Nathalie Leitch	(Associate Marketing Director)	No compensation information located	
	(Kadian®)		
Jennifer Altier	(Marketing Director - Consultant)	No compensation information located	
	(Kadian®)		
Lisa Miller	(Product Manager - Consultant)	No compensation information located	
	(Kadian®)		

Employee	Role	Compensation Information
Michael Kuderka	(Executive Director, Marketing	No compensation information located
	Established Brands)	
	(Kadian® and Norco®)	
Julie Snyder	(Associate Vice President,	Compensation not tied to the sale of
	Marketing)	opioids
	(Kadian® and Norco®)	
Michael Perfetto	(Vice President, Sales and	No compensation information located
	Marketing)	
	(generics)	
Jinping	(Director of Marketing)	No compensation information located
McCormick	(generics)	
David Myers	(Senior Manager, Products &	No compensation information located
-	Communications)	_
	(generics)	
Rachelle Galant	(Senior Product Manager)	Compensation not tied to the sale of
	(generics)	opioids

MARCH 4, 2019 RESPONSE TO INTERROGATORY NO. 25: Subject to and without

waiving its objections, Allergan also refers Plaintiff to its production of personnel files for additional compensation-related information. See, e.g., ALLERGAN_MDL_00181144; ALLERGAN_MDL_00181166; Acquired_Actavis_01170419; Acquired_Actavis_01170658; Acquired Actavis 01171397; Acquired_Actavis_01171401; Acquired_Actavis_01540400; Acquired Actavis 01543660; Acquired Actavis 00096857; Acquired Actavis 00240730; Acquired Actavis 00397908; Acquired Actavis 00397970; Acquired Actavis 00399135; Acquired_Actavis_00667258; Acquired_Actavis_00399659; Acquired_Actavis_00667303; Acquired_Actavis_00667348; Acquired_Actavis_00667408; Acquired_Actavis_00674027; Acquired_Actavis_00675168; Acquired_Actavis_00676689; Acquired_Actavis_01224210; Acquired_Actavis_01225819; ALLERGAN_MDL_04213322; ALLERGAN_MDL_01053071; ALLERGAN MDL 01195555; ALLERGAN MDL 01110891; ALLERGAN_MDL_00213917; ALLERGAN_MDL_00214484; ALLERGAN_MDL_00221283; ALLERGAN_MDL_00406528;

ALLERGAN_MDL_01731239; ALLERGAN_MDL_01731247; ALLERGAN_MDL_01737128; Acquired_Actavis_00097788; Acquired_Actavis_00174873; Acquired Actavis 00174964; Acquired Actavis 00176147; Acquired Actavis 00261601; Acquired Actavis 00261686; Acquired Actavis 00358517; Acquired Actavis 00358896; Acquired Actavis 00581496; Acquired Actavis 00583193; Acquired Actavis 00586603; ALLERGAN_MDL_03477282; Acquired_Actavis_01250914; Acquired_Actavis_01341890; Acquired_Actavis_01350473; Acquired_Actavis_00399093; Acquired_Actavis_00399672; ALLERGAN MDL 00472844; ALLERGAN MDL 00473006; ALLERGAN MDL 00481699; ALLERGAN MDL 00481741; ALLERGAN MDL 00490506; ALLERGAN MDL 00490602; Acquired Actavis 00185296; Acquired_Actavis_00186410; Acquired_Actavis_00610813; Acquired_Actavis_00628532; Acquired_Actavis_00631052; Acquired_Actavis_00952211; Acquired_Actavis_00955549; Acquired_Actavis_02474442; ALLERGAN_MDL_01021870; Acquired_Actavis_01545885; ALLERGAN MDL 01021844; Acquired Actavis 00003928; Acquired Actavis 00003933; Acquired Actavis 00010875; Acquired Actavis 00191236; Acquired Actavis 00219149; Acquired_Actavis_00465364; Acquired_Actavis_00969881; Acquired_Actavis_01402052; Acquired_Actavis_01545875; Acquired_Actavis_01545889; Acquired_Actavis_01696007. addition, Allergan refers Plaintiffs to the deposition transcripts of the individuals listed in the chart included in Allergan's November 16, 2018 Supplemental Response to this Interrogatory for further information on their compensation.

INTERROGATORY NO. 26: Identify all Scientific Research and any other data or information on which You relied to make or cause to be made Marketing statements described in the Complaint, including: (1) improvement in patient function and/or quality of life while on Opioids; (2) the risk and/or prevalence of addiction, abuse, misuse, or diversion of Opioids, including, but not limited to, after OxyContin's 2010 reformulation; (3) the use of risk mitigation

OCTOBER 22, 2018 RESPONSE TO INTERROGATORY NO. 28: Allergan incorporates all objections and statements set forth in its August 31, 2018 Objections and Responses to Plaintiffs' Second Set of Interrogatories. In accordance with the Court's September 21, 2018 Order, Allergan supplements this Interrogatory response with regards to generic opioids.

Subject to and without waiving its objections, Allergan states that it has never itself manufactured, marketed or sold generic drugs. Prior to the fall of 2016, Allergan f/k/a Actavis, Inc. directly or indirectly owned the equity of Actavis Elizabeth LLC, Actavis Pharma, Inc. (f/k/a Watson Pharma, Inc.), Actavis Laboratories FL, Inc. (f/k/a Watson Laboratories Inc. Florida), and Watson Laboratories, Inc. (the "Actavis Generics Companies"). Each of the Actavis Generics Companies is now owned by Teva. Based on Allergan's investigation to date, the individuals with primary responsibility for Actavis generic drugs either remained with the Actavis Generics Companies or left the companies altogether prior to or at the time of the transaction. Allergan, therefore, has not been able to locate any current or former business person at Allergan who had primary responsibility for generics opioids and who has information responsive to Interrogatory No. 28. Nonetheless, Allergan is searching documents that are in Allergan's possession that belong to the Actavis Generics Companies pursuant to the Court's September 21, 2018 Order. Pursuant to Federal Rule of Civil Procedure 33, Allergan refers Plaintiffs to its production of documents pursuant to that Order.

NOVEMBER 16, 2018 RESPONSE TO INTERROGATORY NO. 28:

Subject to and without waiving its objections, Allergan states that the Complaint does not identify any publications Allergan's current or former affiliates allegedly distributed in the Jurisdiction, and does not identify a CME or other program Allergan's current or former affiliates offered in the Jurisdiction. Based on its investigation to date, Allergan's current and former affiliates did not distribute any publication or host any CME regarding Kadian®, Norco®, generic opioids, or opioids generally in the Jurisdiction. Further, Allergan has not identified any website that it currently hosts for the purpose of promoting Kadian®, Norco®, generic opioids or opioids generally. Allergan does host a website at www.kadian.com that contains Kadian®'s FDA-approved, U.S. prescribing information. Allergan has not been able to locate information about the number of hits on this website.

MARCH 4, 2019 RESPONSE TO INTERROGATORY NO. 28: Subject to and without waiving its objections, documents concerning the hit numbers on the www.kadian.com website can be found at ALLERGAN_MDL_01101331 and ALLERGAN_MDL_01101332.

<u>INTERROGATORY NO. 29</u>: Specify the number of and revenue from prescriptions of each of Your Opioids, nationally, in the State of Ohio, and in the Jurisdictions, in each year. Include in your response how many of those prescriptions and what proportion of that revenue was for medically necessary or appropriate prescriptions.

<u>AUGUST 31, 2018 RESPONSE TO INTERROGATORY NO. 29:</u> Allergan objects to this Request by adopting and incorporating by reference its General Objections and Objections to

Definitions. Also, Allergan further objects because Plaintiffs have exceeded the 35-interrogatory limit when counting subparts. In addition, discovery is ongoing and Allergan's investigation is ongoing, and thus it specifically reserves the right to supplement its response.

Subject to and without waiving its objections, and subject to further investigation, discovery and proceedings in this matter, Allergan states that the table below identifies annually the total number of Kadian® prescriptions since Actavis Elizabeth, LLC acquired Kadian® in December 2008:

Year	Nationally	Ohio	Summit County	Akron	Cuyahoga County	Cleveland
2009	605,972	27,946	1,309	746	3,182	1,418
2010	565,920	25,171	1,365	818	2,725	1,235
2011	532,445	26,998	1,840	989	2,564	1,113
2012	185,253	5,792	413	260	565	263
2013	110,086	2,692	216	156	237	143
2014	52,371	1,063	77	65	106	65
2015	33,359	556	39	37	70	43
2016	40,151	450	24	21	67	45
2017	28,484	365	26	23	56	34

Allergan states that the table below identifies annually the total number of Norco® prescriptions since 1997:

Year	Nationally	Ohio	Summit County	Akron	Cuyahoga County	Cleveland
1997	96,430	156	3	0	9	5
1998	533,229	3,207	310	201	520	174
1999	1,093,929	11,907	625	297	2,198	575
2000	1,123,208	18,853	441	180	3,005	1,099
2001	533,809	13,922	1,220	421	1,182	383

2002	642,133	15,764	1,363	439	1,420	462
2003	365,953	8,620	638	186	779	202
2004	190,444	4,224	247	57	480	187
2005	156,765	3,013	216	55	387	139
2006	145,683	1,875	162	59	289	115
2007	136,881	1,605	123	52	248	99
2008	125,780	1,416	136	80	189	51
2009	119,094	1,200	82	46	168	46
2010	126,084	1,002	68	44	133	45
2011	116,890	1,055	38	8	118	59
2012	92,911	1,400	69	33	142	74
2013	258,050	2,405	121	78	296	212
2014	109,695	1,908	98	61	189	111
2015	74,735	1,344	77	44	142	94
2016	58,653	977	49	30	110	70
2017	47,923	782	40	28	97	74

Allergan's national revenue for Kadian® and Norco® since 2014 is as follows:

Product	2014	2015	2016	2017
Kadian®	\$8.5	\$18.7	\$19.6	\$11.3
Norco®	\$18.0	\$22.9	\$21.6	\$20.4

Allergan states that Allergan is not aware of any medically unnecessary or inappropriate prescriptions of Kadian® or Norco® in or related to Cuyahoga County, Summit County, the City of Cleveland, or the City of Akron. Nor have Plaintiffs—which have the burden of proof, which must prove that there were such prescriptions in order to prove their claims, and which Defendants have repeatedly asked for such information—identified a single such prescription in any of Cuyahoga County, Summit County, the City of Cleveland, or the City of Akron.

OCTOBER 22, 2018 RESPONSE TO INTERROGATORY NO. 29:

Allergan incorporates all objections and statements set forth in its August 31, 2018 Objections and Responses to Plaintiffs' Second Set of Interrogatories. In accordance with the

Court's September 21, 2018 Order, Allergan supplements this Interrogatory response with regards to generic opioids.

Subject to and without waiving its objections, Allergan states that it has never itself manufactured, marketed or sold generic drugs. Prior to the fall of 2016, Allergan f/k/a Actavis, Inc. directly or indirectly owned the equity of Actavis Elizabeth LLC, Actavis Pharma, Inc. (f/k/a Watson Pharma, Inc.), Actavis Laboratories FL, Inc. (f/k/a Watson Laboratories Inc. Florida), and Watson Laboratories, Inc. (the "Actavis Generics Companies"). Each of the Actavis Generics Companies is now owned by Teva. Based on Allergan's investigation to date, the individuals with primary responsibility for Actavis generic drugs either remained with the Actavis Generics Companies or left the companies altogether prior to or at the time of the transaction. Allergan, therefore, has not been able to locate any current or former business person at Allergan who had primary responsibility for generics opioids and who has information responsive to Interrogatory No. 29. Nonetheless, Allergan is searching documents that are in Allergan's possession that belong to the Actavis Generics Companies pursuant to the Court's September 21, 2018 Order. Pursuant to Federal Rule of Civil Procedure 33, Allergan refers Plaintiffs to its production of documents pursuant to that Order.

NOVEMBER 16, 2018 RESPONSE TO INTERROGATORY NO. 29:

Subject to and without waiving its objections, Allergan states that in addition to the information previously provided, Plaintiffs can find information about the number of scripts for Kadian®, Norco® and generic opioids in IMS data and Allergan's available transactional data produced at ALLERGAN_MDL_02485011.

The following documents contain responsive information relating to generic opioid products:

- Account receivable transaction level data from Q2 2017 through June 2018 for Teva-Acquired Actavis Entities can be found at TEVA_MDL_A_02419965.
- Net sales data from 2016 2017 for Teva-Acquired Actavis Entities generics can be found at TEVA_MDL_A_02416208 and TEVA_MDL_02419959.
- Net sales data from 2014 2015 for Teva-Acquired Actavis Entities generics products can be found at TEVA_MDL_A_02416208 and TEVA_MDL_02419959.
- Accounts receivable transaction level data from 2013 2017 (Q1) for Teva- Acquired Actavis Entities generics can be found at TEVA_MDL_A_02419969, TEVA_MDL_A_02419963 and TEVA_MDL_A_02419960.
- Additional summary sales data by unit (not dollar value) from 2011 to 2017 for Teva-Acquired Actavis Entities generics can be found at TEVA_MDL_A_02419962.

Indirect sales data from 2001 - Q2 2014 for Teva-Acquired Actavis Entities generics and indirect sales data from 2004 to Q2 2014 for Watson generics can be found at:

• TEVA MDL A 07869902 - TEVA MDL A 07876853

- TEVA_MDL_A_07876854 TEVA_MDL_A_07880642
- TEVA_MDL_A_07880643 TEVA_MDL_A_07885149
- TEVA_MDL_A_07885150 TEVA_MDL_A_07889184
- TEVA_MDL_A_07889185 TEVA_MDL_A_07889288
- TEVA_MDL_A_07889289 TEVA_MDL_A_07901019
- TEVA_MDL_A_07901020 TEVA_MDL_A_07907288
- TEVA_MDL_A_07907289 TEVA_MDL_A_07914957
- TEVA_MDL_A_07914958 TEVA_MDL_A_07921676
- TEVA MDL A 07921677 TEVA MDL A 07921925
- TEVA_MDL_A_07921926 TEVA_MDL_A_07921926
- TEVA_MDL_A_07921927 TEVA_MDL_A_07921927
- TEVA_MDL_A_07921928 TEVA_MDL_A_07928168
- TEVA_MDL_A_07928169 TEVA_MDL_A_07937356

Indirect sales data from Q2 2014 to Q1 2017 for Teva-Acquired Actavis Entities generics and direct sales data from Teva-Acquired Actavis Entities QAD is currently in production.

<u>INTERROGATORY NO. 30</u>: Identify all individuals and entities You have interviewed or from whom You have obtained testimony or from whom You have obtained or attempted to obtain Documents, Communications, or other information that tends to support, contradict, concern, or relate to the allegations in the Complaint or Your defenses. Include in your response a description of the Documents, Communication, or information obtained from such individuals or entities.

AUGUST 31, 2018 RESPONSE TO INTERROGATORY NO. 30: Allergan objects to this Request by adopting and incorporating by reference its General Objections and Objections to Definitions. Also, Allergan further objects because Plaintiffs have exceeded the 35-interrogatory limit when counting subparts. In addition, discovery is ongoing and Allergan's investigation is ongoing, and thus it specifically reserves the right to supplement its response. Allergan further objects to this Request to this Request to the extent it calls for information that is protected by the attorney-client privilege and attorney work product protection. In addition, Allergan objects to the extent this Request purports to call for a "description of the Documents, Communication, or information obtained from such individuals or entities" as overly broad and unduly burdensome; to the extent responsive to Plaintiff's Requests for Production, Allergan will produce documents, including metadata identifying such documents, gathered from the custodial sources listed below.

Date: March 4, 2019 Respectfully submitted,

/s/ Timothy W. Knapp

Jennifer G. Levy, P.C. KIRKLAND & ELLIS LLP 655 Fifteenth Street, N.W. Washington, D.C. 20005 Telephone: (202) 879-5000 Facsimile: (202) 879-5200 jennifer.levy@kirkland.com

Donna Welch, P.C.
Martin L. Roth
Timothy W. Knapp
KIRKLAND & ELLIS LLP
300 North LaSalle, Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
donna.welch@kirkland.com
rothm@kirkland.com
tknapp@kirkland.com

Attorneys for Defendant Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.